

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications
and Energy on its own Motion to Implement the
Requirements of the Federal Communications
Commission's Triennial Review Order Regarding
Switching for Mass Market Customers

D.T.E. 03-60 – Track B

**AT&T's SEVENTH SET OF
INFORMATION REQUESTS TO VERIZON-MASSACHUSETTS**

AT&T Communications of New England, Inc. ("AT&T") hereby submits to Verizon-Massachusetts ("Verizon") the following information requests. AT&T requests responses in accordance with the Procedural Order Memorandum and Ground Rules issued by the Department in this docket on October 17, 2003 and November 24, 2003.

INSTRUCTIONS

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
3. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
4. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
5. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
6. Unless otherwise stated, information requests refer to the state of Massachusetts.

INFORMATION REQUESTS

ATT-VZ-191 Have any of the Verizon hot cut witnesses, specifically Mr. Maguire, Mr. White, and Mr. McLaughlin, worked as a technician on the cross connection frames? Have they ever performed frame work in any capacity? If so, please describe the nature of the work that they did and identify the time period and the locations where they performed such activity.

ATT-VZ-192 For all hot cut LSRs that failed to flow through and that required manual confirmation as summarized in Exhibit 5 to Verizon's Rebuttal Panel Testimony (Hot Cut Process and Scalability), please provide the following information (preferably in the form of an Excel spreadsheet or other table):

- (a) LSR detail, including at a minimum the CLEC ID, the number of lines on the order, and the hot cut process used;
- (b) The reason code or rationale as to why each LSR failed to flow through, such as the order was not flow-through eligible, CLEC input error, Verizon system problem, etc.;
- (c) The source of the information regarding the rationale; and
- (d) The time and manner of the collecting of the information.

ATT-VZ-193 For each LSR shown as not flowing through on Exhibit 6 to Verizon's Rebuttal Panel Testimony (Hot Cut Process and Scalability), please provide the reason code/rationale explaining why the order did not flow through. This information (presented preferably in the form of an Excel spreadsheet or other table) would include details such as: the order was not flow-through eligible, CLEC input error, Verizon system problem, etc. Please include (a) the source of the information regarding the rationale and (b) the time and manner of the collecting of the information.

ATT-VZ-194 Please identify all types of information stored in Verizon's loop inventory database that can be obtained based on the circuit identification (or TXNU) of the loop. This information may include, but is not limited to the following: cable and pair identification of the loop, MDF frame location of the loop, CLEC that owns the loop (if the loop is not a retail loop), and the customer premises address where the loop terminates.

ATT-VZ-195 With respect to its proposed batch hot cut process, has Verizon discussed the process for reversing a number port with the NPAC administrator should it be discovered that there is a problem on the line and a throwback is necessary? If so, when did this discussion take place and what was the outcome of these discussions? Please provide memoranda, notes and other documents reflecting the outcome of these conversations, including any correspondence or other written communication between Verizon and NPAC reflecting the outcome of these conversations.

ATT-VZ-196 Please explain in detail why "there are currently over 1,000 unused collocation arrangements in Verizon's Massachusetts central offices where Verizon claims the triggers are met" as stated on page 93 of Verizon's Rebuttal Panel Testimony

(Hot Cut Process and Scalability). In your explanation, please explain how many of these arrangements were established for CLECs that are no longer providing local exchange service.

ATT-VZ-197 On page 94 of its Rebuttal Panel Testimony (Hot Cut Process and Scalability), Verizon states that “of the 181 central offices in density Zones 1, 2 and 3 in the MSA’s in which Verizon is seeking a finding of no impairment 121 currently have in-service arrangements with a capacity for 1,025,615 Voice Grade loops.” Please fully explain the basis for Verizon’s estimate that these collocations are capable of supporting 1,025,615 voice grade loops.

ATT-VZ-198 Verizon states on page 102 of its reply testimony that “the increase in staff levels necessary to handle the increase in hot cut volumes after the elimination of UNE-P would merely bring the level of frame activity closer to staffing levels prevailing in earlier years.” Please explain what these “earlier years” were and the nature of the work that the frame staff was performing in these “earlier years.” Please fully explain the basis for Verizon’s claim that the staff levels were the same in those “earlier” years as the staffing that would be required if UNE-P were eliminated, including evidence of staffing levels in those “earlier” years.

ATT-VZ-199 On page 103 of its reply testimony Verizon states that “a reasonable level of this type of activity is a normal workplace phenomenon appropriately factored in measuring work times for various tasks; and such work times are thus appropriately measured against the *actual* length of the shift, not a reduced length as Mr. Falcone proposes.” Please provide what the actual length of the technician shift is that was the basis for the 7.5 hours of productive time in Verizon’s force model. Please fully explain how the “actual” length of the shift is measured and all calculations used to derive the “actual” length.

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March 1, 2004